

USSN: 10/810,065Attorney Docket No.: 55752US019**Remarks**

Claims 1, 26, 50 and 51 have been amended and new claims 62-65 have been added as shown above. Support for the amendments and new claims may be found in the written description at, e.g., paragraphs 0003, 0033, 0045 and 0048. Following entry of this amendment, claims 1-65 will be pending in this application.

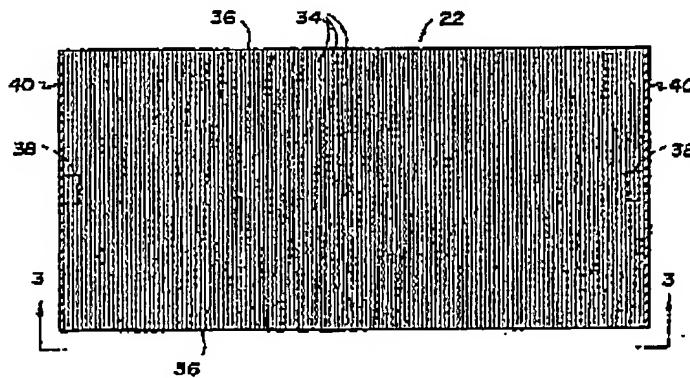
**Rejection of Claims 1-6, 8, 9, 12-18, 24-31, 33,  
36-39, 41, 42, 48-54 and 58 under 35 U.S.C. §102(b)**

Claims 1-6, 8, 9, 12-18, 24-31, 33, 36-39, 42, 48-54 and 58 were rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,536,333 (Foote et al.), on grounds set out at pages 2-4 of the Office Action. Applicant requests reconsideration. Applicant does not agree with several of the assertions in the Office Action. For example, applicant does not agree that Foote et al. show "conveying the substrate through a dry converting station in a close enclosure while supplying the enclosure with one or more streams of conditioned gas flowing at a rate sufficient to reduce materially the particle count in the close enclosure" or "flowing a stream of conditioned gas at a rate sufficient to reduce a close enclosure particle count by 75% or more". Foote et al. mention controlling the environment in their apparatus 70 to prevent disruption of the semiconductor coating process by variable water vapor in the atmosphere (see e.g., col. 11, lines 54-58), but nowhere discuss particle count levels.

In any event, Foote et al. do not perform a process involving "unwinding a web substrate" as recited in amended rejected claims 1-6, 8, 9, 12-18, 24, 25, 50, 53 and 58, and do not disclose an apparatus having "an unwind reel" and "web-handling equipment" as recited in amended rejected claims 26-31, 33, 36-39, 42, 48-52 and 54. Foote et al. deposit semiconductor materials on 60 cm x 120 cm (2 ft by 4 ft) rectangular glass sheets 24 (see e.g., col. 6, lines 33-41 and Fig. 2, reproduced below):

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*Fig. 2*

Foote et al.'s glass sheets could not be unwound. Foote et al. do not disclose the process of rejected claims 1-6, 8, 9, 12-18, 24, 25, 50, 53 and 58 and do not disclose the apparatus of rejected claims 26-31, 33, 36-39, 42, 48-52 and 54. Applicant accordingly requests withdrawal of the U.S.C. §102(b) rejection of claims 1-6, 8, 9, 12-18, 24-31, 33, 36-39, 42, 48-54 and 58 as being anticipated by Foote et al.

#### Allowed Subject Matter

Claims 7, 10, 11, 19-23, 32, 34, 35, 40, 43-47, 55-57 and 59-61 were said to be allowed in the Office Action Summary Sheet. Applicant assumes that the statement at page 5 of the Office Action that these same claims would be allowable "if rewritten in independent form including all of the limitations of the base claim and any intervening claims" was included in error. Claims 7, 10, 11, 19-23, 32, 34, 35, 40, 43-47, 55-57 and 59-61 had already been so rewritten, via the requested entry of the October 14, 2005 Amendment After Final Rejection made when filing a Request for Continuing Examination on November 18, 2005.

#### Conclusion

Applicants have made an earnest effort to address the rejections. Foote et al. do not perform a process involving "unwinding a web substrate" as recited in claims 1-6, 8, 9, 12-18, 24-31, 33, 36-39, 42, 48-54 and 58, and do not disclose an apparatus having "an unwind reel"

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and "web-handling equipment" as recited in claims 26-31, 33, 36-39, 42, 48-52 and 54. All claims should be allowable.

The Examiner is encouraged to call the undersigned attorney if there are any questions regarding the application or this amendment.

Respectfully submitted on behalf of  
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